

SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF KINGS

-----X
DYROL HARDING and AYANNA PARKER
HARDING

Plaintiffs,

-against-

STATE FARM FIRE AND CASUALTY COMPANY,

Defendant.
-----X

Index No.

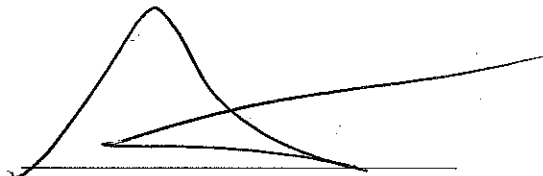
SUMMONS

Plaintiff's Address:
12314 W. Sample Rd
Pompano Beach, FL 33065

The basis of the venue designated is:
Place of Loss

YOU ARE HEREBY SUMMONED to answer the Complaint in this action and to serve a copy of your Answer on the Plaintiff's attorneys within twenty (20) days after the service of this summons, exclusive of the day of service or within thirty (30) days after the service is complete if this summons is not personally delivered to you within the State of New York and in case of your failure to Answer, judgment will be taken against you by default for the sum of \$585,583.82 with interest from September 3, 2016, together with costs, disbursements and attorneys fees.

Dated: New York, New York
July 10, 2017



Matthew S. Aboulafia, Esq.
Aboulafia Law Firm, LLC
Attorneys for Plaintiff
228 East 45th Street, Suite 1700
New York, NY 10017
(212) 684-1422

TO:

Service via Superintendent of Insurance
New York State Insurance Department
Corporate Affairs Unit
One Commerce Plaza
Albany, NY 12257

SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF KINGS

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Index No.

COMPLAINT

Plaintiffs,

-against-

STATE FARM FIRE AND CASUALTY COMPANY,

Defendant.
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Plaintiffs, by their attorney Aboulafia Law Firm LLC, as and for their Complaint, herein alleges upon information and belief as follows:

1. At all times hereinafter mentioned, Plaintiffs Dyrol Harding and Ayanna Parker Harding (hereinafter collectively "Harding") own the property located at 879 Lafayette Avenue, Brooklyn, NY 11223 (hereinafter "subject premises").
2. At all times hereinafter mentioned, Defendant STATE FARM FIRE AND CASUALTY COMPANY (hereinafter "State Farm") was and still is a corporation authorized, licensed, admitted and/or engaged in the business of providing insurance and being an insurer in the State of New York, and located at P.O. Box 106110, Atlanta, GA 30348-6110.
3. At all times hereinafter mentioned, Defendant State Farm was and is authorized by the Superintendent of Insurance of the State of New York to engage in the business of insurance in the State of New York and to issue policies of insurance including the policy herein sued upon.

**AS AND FOR A FIRST CAUSE OF ACTION IN BREACH OF CONTRACT AGAINST
STATE FARM**


4. In 2015, Plaintiff obtained a Homeowners Policy from Defendant State Farm insuring the subject premises, bearing policy number 56-BEJ7492 whereby Plaintiff did obtain insurance

from Defendant State Farm, for Plaintiff's property located at 879 Lafayette Avenue, Brooklyn, NY 11223.

5. That on or about September 3, 2016, while said policy was in full force and effect, Plaintiff suffered a loss by a covered peril of property insured by Defendant State Farm.
6. At all relevant times, Plaintiff had an insurable interest in the aforementioned property.
7. As a result of the loss, Plaintiff has sustained damages in the sum of at least Five Hundred Eighty-Five Thousand Five Hundred Eighty-Three Dollars and Eighty-Two Cents (\$585,583.82).
8. Defendant State Farm has declined to indemnify Plaintiff for the loss sustained although a claim has been duly made and all conditions of the policy have been met.
9. As a result of Defendant State Farm's Breach of Contract, Plaintiff has been damaged in the sum of at least Five Hundred Eighty-Five Thousand Five Hundred Eighty-Three Dollars and Eighty-Two Cents (\$585,583.82).

WHEREFORE, it is respectfully requested that Plaintiffs have judgment against Defendant STATE FARM FIRE AND CASUALTY COMPANY on the first cause of action; for the total sum of \$585,583.82, with interest from September 3, 2016, and for costs and disbursements of this action.

Dated: New York, New York
July 10, 2017



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